## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND DEVELOPMENT,

No. 6:20-cv-00815-ADA

Plaintiff,

JURY TRIAL DEMANDED

v.

JUNIPER NETWORKS, INC.,

Defendant.

## BRAZOS'S NOTICE OF FILING OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,596,140

Pursuant to the Court's Order Governing Proceedings – Patent Case (Dkt. 26), plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development ("Brazos"), hereby provides the Court with notice that a petition for *inter partes* review ("IPR") of the patent asserted in this case — U.S. Patent No. 7,596,140 ("the '140 patent") — has been filed:

## IPR2021-00538

Petitioner: Juniper Networks, Inc. ("Juniper")

(the defendant in this case)

Other Real Parties-in-Interest: none

filing date: February 12, 2021

(notice of filing date accorded not yet issued)

expected time for institution decision: within 6 months of notification of filing date,

*i.e.*, by about August 2021

expected time for final written decision: within 1 year of institution, i.e., by about August 2022

The claim construction hearing in this case is scheduled for June 3, 2021 and trial has been scheduled to begin on July 11, 2022. *See* Case No. 6:20-cv-00812, Dkt. 38.

Juniper has filed an opposed motion to transfer this case to the Northern District of California, Dkt. 18, relating to which the parties are conducting discovery pursuant to the Court's

Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases. Juniper has also filed an opposed motion to stay the proceedings of this case pending the resolution of its motion to transfer, Dkt. 32. *See also* Dkt. 34 (Brazos's opposition to Juniper's motion to stay); Dkt. 35 (Juniper's reply in support of motion to stay).

## Respectfully submitted,

Dated: February 18, 2021

/s/ Raymond W. Mort, III

Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com
THE MORT LAW FIRM, PLLC
100 Congress Avenue, Suite 2000
Austin, Texas 78701
tel/fax: (512) 677-6825

David M. Stein
Texas State Bar No. 797494
dstein@brownrudnick.com
Sarah G. Hartman
California State Bar No. 281751
shartman@brownrudnick.com
BROWN RUDNICK LLP
2211 Michelson Drive, 7<sup>th</sup> Floor
Irvine, California 92612
telephone: (949) 752-7100
facsimile: (949) 252-1514

Edward J. Naughton (admitted *pro hac vice*) enaughton@brownrudnick.com Rebecca MacDowell Lecaroz (admitted *pro hac vice*) rlecaroz@brownrudnick.com BROWN RUDNICK LLP One Financial Center Boston, Massachusetts 02111 telephone: (617) 856-8200 facsimile: (617) 856-8201

Alessandra C. Messing (admitted *pro hac vice*) amessing@brownrudnick.com Timothy J. Rousseau

(admitted *pro hac vice*) trousseau@brownrudnick.com Yarelyn Mena (admitted *pro hac vice*) ymena@brownrudnick.com BROWN RUDNICK LLP 7 Times Square New York, New York 10036 telephone: (212) 209-4800 facsimile: (212) 209-4801

Counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development